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a project of the CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE

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Attorneys for Defendant
VERCO MANUFACTURING, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

WATERSHED ENFORCERS,

Plaintiff,

vs.

VERCO MANUFACTURING, INC.,

Defendant.

Case No. C 06 2694 SI

**JOINT NOTICE OF SETTLEMENT IN
LIEU OF CASE MANAGEMENT
STATEMENTS AND RULE 26(f)
REPORT; STIPULATED REQUEST TO
EXTEND THE EXISTING CASE
SCHEDULE**

Conference: July 21, 2006
Time: 2:00 p.m.
Courtroom: 10

Joint Notice Of Settlement In Lieu Of
Case Management Statements And
Rule 26(F) Report; Stipulated Request
To Extend The Existing Case Schedule

1 Pursuant to Local Rules 6-2, 7-12, 16-2(d)-(e), Plaintiff Watershed Enforcers and
2 Defendant Verco Manufacturing, Inc. hereby notify the Court that the parties have reached a
3 settlement agreement that will fully resolve this litigation. A true and correct copy of the
4 executed settlement agreement is attached as Exhibit A to the Declaration of Michael R.
5 Lozeau, filed contemporaneously with this Notice and Stipulated Request. Plaintiff has
6 forwarded the settlement agreement to the United States Environmental Protection Agency
7 and the United States Department of Justice to begin a 45-day review period by those
8 agencies prescribed by Section 505(c)(3) of the Federal Water Pollution Control Act, 33
9 U.S.C. § 1365(c)(3). Lozeau Dec., ¶ 3; *Id.*, Exhibit B. At the completion of that 45-day
10 agency review period, the parties will file a stipulated request for dismissal requesting the
11 Court to maintain jurisdiction to enforce the terms of the settlement agreement. *Id.*, ¶ 4 &
12 Exhibit A, ¶ 2.

13 In light of the parties' entering into the settlement agreement and the need to allow the
14 federal agencies 45 days to review the agreement, the parties further request that the Court
15 accept this notice of settlement in lieu of the formal joint case management statement and
16 Rule 26(f) Report required pursuant to the Court's case management order dated April 20,
17 2006.

18 The parties further request that, in light of the settlement agreement and the 45-day
19 agency review period, the Court extend the initial case management conference currently
20 scheduled for July 21, 2006 for a period of about 70-days, until October 6, 2006, by which
21 date the parties will have filed their stipulated request for dismissal which very likely will
22 obviate the need for preparing either a case management order or Rule 26(f) Report. Should

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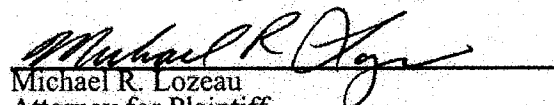
1 the case not be dismissed by September 30, 2006, the parties shall file any necessary case
2 management statement and Rule 26(f) Report by September 30, 2006.

3 Dated: July 14, 2006

Respectfully submitted,

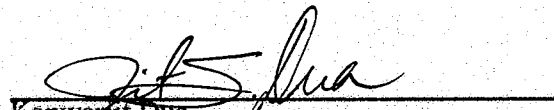
4 LAW OFFICE OF MICHAEL R. LOZEAU

5
6 By:


Michael R. Lozeau
Attorney for Plaintiff
WATERSHED ENFORCERS, a project of the
CALIFORNIA SPORTFISHING PROTECTION
ALLIANCE


10 SOMACH, SIMMONS & DUNN

11
12 By:


Kanwarjit Dua
Attorney for Defendant Verco Manufacturing, Inc.

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16
17 Dated: _____, 2006


Judge Susan Illston
United States District Court Judge